


EXHIBIT L

From: [Loftus, Julie](#)
To: [Chris Kachouroff](#)
Cc: [Frey, Timothy](#); [Bedell, James](#)
Subject: RE: Conan Hayes Deposition
Date: Wednesday, June 26, 2024 7:15:42 PM
Attachments: [image001.jpg](#)
[image748221.jpg](#)

Chris,

Are you or one of your partners available to depose Mr. Hayes the week of July 22 through 26? Please let me know as soon as possible.



Julie Loftus
(she/her/hers)
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From: Chris Kachouroff <chris@mck-lawyers.com>
Sent: Friday, June 21, 2024 12:27 PM
To: Loftus, Julie <JLoftus@beneschlaw.com>
Cc: Frey, Timothy <TFrey@beneschlaw.com>
Subject: Re: Conan Hayes Deposition

They cannot either.

On Fri, Jun 21, 2024 at 1:26 PM Loftus, Julie <JLoftus@beneschlaw.com> wrote:

You had said you would see if one of your partners could cover it—any news on that front?



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From: Chris Kachouroff <chris@mck-lawyers.com>
Sent: Friday, June 21, 2024 12:24 PM
To: Loftus, Julie <JLoftus@beneschlaw.com>
Cc: Frey, Timothy <TFrey@beneschlaw.com>
Subject: Re: Conan Hayes Deposition

I cannot. As I explained, I will be in depositions next week.

On Fri, Jun 21, 2024 at 1:20 PM Loftus, Julie <JLoftus@beneschlaw.com> wrote:

Chris,

Following up on the Hayes deposition on June 26 or 27.

Julie



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From: Frey, Timothy <TFrey@beneschlaw.com>

Sent: Tuesday, June 18, 2024 10:16 PM

To: Chris Kachouroff <chris@mck-lawyers.com>

Cc: Loftus, Julie <JLoftus@beneschlaw.com>

Subject: RE: Conan Hayes Deposition

Thanks, Chris.



[vCard Bio](#)

Timothy M. Frey
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From: Chris Kachouroff <chris@mck-lawyers.com>

Sent: Tuesday, June 18, 2024 10:14 PM

To: Frey, Timothy <TFrey@beneschlaw.com>

Cc: Loftus, Julie <JLoftus@beneschlaw.com>

Subject: Re: Conan Hayes Deposition

I cannot. I am in Dominion depositions back to back from 26-28 June. Let me find out if one of my partners can cover this.

On Tue, Jun 18, 2024 at 10:48 PM Frey, Timothy <TFrey@beneschlaw.com> wrote:

Chris,

Do you have any availability on June 26 or June 27 for a remote deposition of Conan Hayes? We have heard back from him regarding his availability and those are the days he has offered.

Please let us know.

Thanks,

Tim



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Timothy M. Frey
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